



Coastal
The Energy People

KEN PAYNE
VICE PRESIDENT &
GENERAL MANAGER
SOUTHERN UTAH FUEL COMPANY

RECEIVED
DEC 20 1990

DIVISION OF
OIL, GAS & MINING

December 14, 1990

Lowell Braxton
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RE: NOV NO. N90-39-1-1

Dear Mr. Braxton:

Southern Utah Fuel Company was issued NOV N90-39-1-1 as a result of the Division of Environmental Health's November 15, 1990 letter notifying us that the average monthly permit limit for TDS had been exceeded five times in the past six months. Enclosed is a copy of our response letter to the Division of Environmental Health.

The information contained in our response to the Division of Environmental Health should abate the NOV and should also be considered in the assessment of the violation. We have previously requested a revision of the TDS limits for discharge point 003 and will continue to pursue a revision of these UPDES limits. Possible sources of sulfates and how to manage them are under review at this time.

As you assess the NOV penalty, we ask that you consider the fact that our UPDES permit limitations for TDS are much more stringent than those for other UPDES mining dischargers in the Colorado River drainage system.

Sincerely,
SOUTHERN UTAH FUEL COMPANY

Ken M. Payne,
Vice President and General Manager

KMP/WKS:jad#137

Enclosure

Southern Utah Fuel Company

A SUBSIDIARY OF THE COASTAL CORPORATION
397 SOUTH 800 WEST • SALINA UT 84654 • 801/637-4880



Coastal
The Energy People

W. E. PAYNE
VICE PRESIDENT &
GENERAL MANAGER
SOUTHERN UTAH FUEL COMPANY

DOH Corresp

December 14, 1990

Mr. Donald A. Hilden
Permitting & Compliance Section Manager
Department of Health
P.O. Box 16690
Salt Lake City, Utah 84116-0690

Dear Mr. Hilden:

As stated in your November 15, 1990 letter, Southern Utah Fuel Company's discharge from NPDES Point 003 has accumulated a history of exceeding the permit (UT0022918) limits in recent months. Enclosed is Figure 1, "TDS of Discharge Point 003." This figure shows that the TDS level has varied over the years, but has generally increased during 1990.

Mining activity at SUFCo during 1990 has moved from the east side of the mine to the western and northern areas. These moves have resulted in more water being discharged from these areas -- particularly from the western portion of the mine.

No new mining practices or procedures have been introduced. Dust control at the working faces has been and still is done using only mine water discharged through water sprays on the mining equipment. No additives are being used.

An analysis of potential causes is being undertaken. At this point it has been determined that an increase in SO_4 ions is responsible for a corresponding increase in TDS. The source or sources of the additional SO_4 ions is not clear. One in-mine water sampling station, NME2C209, has a mean SO_4 level of 118 mg/l as compared to 67 mg/l for station PT062 which is located about one mile south of NME2C209. This suggests that SO_4 levels in the ground water may be increasing to the north. Other sources of SO_4 ions are being looked for and investigated.

Southern Utah Fuel Company

A SUBSIDIARY OF THE COASTAL CORPORATION
397 SOUTH 800 WEST • SALINA UT 84654 • 801.637-4880

Mr. Donald A. Hilden

Page two

December 14, 1990

We previously requested changes in our discharge limitations and were asked by the Division of Environmental Health to delay the request and include it as part of the application for permit renewal. We will, of course, continue to try to minimize TDS levels. However, to accommodate problems encountered in our mining operation, we propose to resubmit our earlier requests. This will also include a request to modify our TDS limitations to make them consistent with the Colorado River Salinity Forum requirements and also to be consistent with the limits of other dischargers into the Colorado River system. Specifically, we will formally request as part of the permit renewal that the daily maximum TDS limitation for point source 003 be established at 1000 mg/l and that the annual average be established at 723 mg/l.

Until we successfully reduce TDS levels or complete the formal permit reissuance process with modifications (July 31, 1991), we may be subject to an ongoing violation situation with the Division of Oil, Gas, and Mining. They have already cited us once as a result of your letter. Therefore, we herein request an interim administrative modification of permit TDS limits to the daily maximum and annual average limits proposed above. We ask that this interim modification be approved until the permit reissuance process is complete.

If you have any questions, please call me at 637-4880.

Sincerely,

SOUTHERN UTAH FUEL COMPANY



Ken M. Payne,

Vice President and General Manager

KMP/WKS:jad#300

Enclosure

xc: Lowell Braxton

Division of Oil, Gas, and Mining

FIGURE 1. TDS OF DISCHARGE POINT 003

